

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

**(1) CYNTHIA GRAVES,**

**Plaintiff,**

**VS.**

**Case No. 17-CV-382-CVE-FHM**

**(2) GREEN COUNTRY STAFFING, INC**  
a domestic for profit corporation,

**(Formerly District Court of Tulsa  
County, Oklahoma Case No.**

**(3) TULSA'S GREEN COUNTRY STAFFING HOLDING, LLC, a domestic limited liability company,**

**CJ-2017-01695)**

**(4) TULSA'S GREEN COUNTRY STAFFING, LLC, a domestic limited liability company, and**

**(5)INFINITE PACKAGING GROUP, INC.,**  
**a foreign for profit business corporation,**

**Defendants.**

## NOTICE OF REMOVAL

Defendant Infinite Packaging Group (“Infinite” or “Defendant”), pursuant to 28 U.S.C. §§ 1331, 1441 and 1446, hereby removes this action from the District Court of Tulsa County to the United States District Court for the Northern District of Oklahoma. As grounds for removal, Infinite states as follows:

1. On May 1, 2017, Plaintiff filed a Petition in the District Court of Tulsa County, State of Oklahoma, which is located in the Northern District of Oklahoma. The case was assigned No. CJ-2017-01695. A true and correct copy of the Petition is attached as Exhibit 1.

2. Civil summons and copies of the Petition were served upon the Defendant Infinite on June 13, 2017, via certified mail. A copy of the State Court Docket Sheet is attached as Exhibit 2.

3. Plaintiff's Petition was served upon Defendant Tulsa's Green Country Staffing Holding, LLC on June 12, 2017. Plaintiff's Petition was never served on Defendants Green Country Staffing, Inc. and Tulsa's Green Country Staffing, LLC.

4. Pursuant to 28 U.S.C. § 1446(b)(2)(A), Tulsa's Green Country Staffing Holding, LLC, as the only other properly joined and served Defendant, consents to the removal of this action. Defendants Green Country Staffing, Inc. and Tulsa's Green Country Staffing, Inc. similarly consent to the removal. The Consent of the Green Country Defendants is attached as Exhibit 3.

5. Pursuant to 28 U.S.C. § 1446(b), this Notice of Removal is timely filed within thirty (30) days after service of process. Removing Defendant Infinite was served with process on or about June 13, 2017.

6. The United States District Court of the Northern District of Oklahoma has jurisdiction over this case pursuant to 28 U.S.C. § 1331, 1441(a). 28 U.S.C. § 1331 provides that federal courts have original jurisdiction over "all civil actions arising under the Constitution, laws or treaties of the United States" ("Federal Question").

7. The Petition's First and Second Causes of Action allege violations of Title VII of the Civil Rights Act (42 U.S.C. § 2000 *et seq.*). Further, the Petition references Plaintiff's two Charges of Discrimination filed with the Equal Employment Opportunity Commission ("EEOC"). Accordingly, this action is removable pursuant to 28 U.S.C. §§ 1331 and 1441 under this Court's federal question jurisdiction. Therefore, this Court has original jurisdiction.

8. As required by 28 U.S.C. § 1441, Defendant Infinite seeks to remove this case to the United States District Court for the Northern District of Oklahoma, which is the district court embracing the county where Plaintiff filed the state court suit.

9. Pursuant to 28 U.S.C. § 1446(d), copies of this Notice of Removal shall be served upon Plaintiff and the clerk of the District Court of Tulsa County, State of Oklahoma, from which this matter is removed.

10. As required by Local Rule LCVR 81.2, a true and correct copy of all documents filed or served in this case, along with a copy of the docket sheet, are attached hereto as Exhibits 1 and 2. Additionally, Defendant Infinite will file a Status Report on Removed Action with the clerk upon filing of this Notice.

11. Defendant reserves the right to plead all affirmative defenses stated in Fed. R. Civ. P. 12(b) in accordance with Fed. R. Civ. P. 81(c).

WHEREFORE, Defendant hereby removes this action from this District Court of Tulsa County, State of Oklahoma, to the United States District Court for the Northern District of Oklahoma.

Dated: June 30, 2017

Respectfully submitted,

*s/Charles S. Plumb*

Charles S. Plumb, OBA # 7194

Anna C. Lukeman, OBA # 32449

**McAFEE & TAFT, P.C.**

Williams Center Tower II

Two W. Second Street, Suite 1100

Tulsa, Oklahoma 74103

(918) 574-3003 (Telephone)

(918) 574-3103 (Facsimile)

[charlie.plumb@mcafeetaft.com](mailto:charlie.plumb@mcafeetaft.com)

[anna.lukeman@mcafeetaft.com](mailto:anna.lukeman@mcafeetaft.com)

***Attorneys for Defendant Infinite Packaging  
Group, Inc.***

**CERTIFICATE OF SERVICE**

I hereby certify that on June 30, 2017, I electronically transmitted the attached document to the Clerk of the Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following registrants:

David A. Warta  
Mark A. Waller

*s/Charles S. Plumb*\_\_\_\_\_